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U.S. DISTRICT COURT  
DISTRICT OF ARIZONA

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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE DISTRICT OF ARIZONA

10 United States of America,  
11 Plaintiff,

12 vs.

13  
14 [REDACTED]  
15  
16 2. Jesus Torres-Aguilera,  
17 Defendants.

CR21-02715-TUC-JAS(LCK)

INDICTMENT  
(UNDER SEAL)

Violations:

8 U.S.C. § 1324(a)(1)(A)(v)(I)  
8 U.S.C. § 1324(a)(1)(A)(ii)  
8 U.S.C. § 1324(a)(1)(A)(iii)  
8 U.S.C. § 1324(a)(1)(B)(i)  
(Conspiracy to Transport and Harbor  
Illegal Aliens for Profit)  
Count 1

18 18 U.S.C. § 982(a)(6)  
19 Forfeiture Allegation

20  
21 THE GRAND JURY CHARGES:

22 COUNT 1

23 From a date unknown to on or about October 20, 2021, in the District of Arizona  
24 and elsewhere, [REDACTED] and JESUS  
25 TORRES-AGUILERA did knowingly and intentionally combine, conspire, confederate,  
26 and agree together and with various persons known and unknown, to transport and move  
27 illegal aliens within the United States by means of transportation or otherwise, and to  
28 conceal, harbor and shield from detection said aliens, all in furtherance of such violation

1 of law for the purpose of commercial advantage or private financial gain, in violation of  
2 Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I), 1324(a)(1)(A)(ii),  
3 1324(a)(1)(A)(iii) and 1324(a)(1)(B)(i).

4 **FORFEITURE ALLEGATION**

5 Upon conviction of an offense in violation of Title 8, United States Code, Section  
6 1324 alleged in this Indictment, defendants [REDACTED]  
7 [REDACTED] and JESUS TORRES-AGUILERA, shall forfeit to the United States  
8 pursuant to Title 18, United States Code, Section 982(a)(6): (a) any conveyance, including  
9 any vessel, vehicle, or aircraft, used in the commission of the offense; (b) any property,  
10 real or personal, that constitutes or is derived from or is traceable to the proceeds obtained  
11 directly or indirectly from the commission of the offense; and (c) any property, real or  
12 personal, used to facilitate or intended to be used to facilitate the commission of the offense,  
13 including, but not limited to: a sum of money representing the amount of proceeds obtained  
14 as a result of the offense.

15 If any of the property described above, as a result of any act or omission of the  
16 defendant(s): a) cannot be located upon the exercise of due diligence; b) has been  
17 transferred or sold to, or deposited with, a third party; c) has been placed beyond the  
18 jurisdiction of the court; d) has been substantially diminished in value; or e) has been  
19 commingled with other property which cannot be divided without difficulty, it is the intent  
20 of the United States to seek forfeiture of any other property of the defendant(s) up to the  
21 value of the above-described forfeitable property, including but not limited to all property,  
22 both real and personal, owned by the defendant(s), pursuant to Title 21, United States Code,  
23 Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and  
24 Title 28, United States Code, Section 2461(c).

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1 All pursuant to Title 18, United States Code, Section 982(a)(6) and (b)(1), Title 21,  
2 United States Code, Section 853(p), Title 28, United States Code, Section 2461(c), and  
3 Rule 32.2(a), Federal Rules of Criminal Procedure.

4  
5 A TRUE BILL

6 /s/

7 FOREPERSON OF THE GRAND JURY  
8 Date: October 20, 2021

9 GLENN B. McCORMICK  
10 Acting United States Attorney  
District of Arizona

**REDACTED FOR  
PUBLIC DISCLOSURE**

11 /s/

12 MICHAEL R. LIZANO  
13 Assistant U.S. Attorney